

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

TROY D. GERMAN,)	
)	
Plaintiff,)	
)	Case No. CIV-19-751-F
v.)	
)	
BILLY D. "RUSTY" RHOADES,)	
individually;)	
)	
MICHAEL HARRELL, individually;)	
)	
BRIAN ORR, individually;)	
)	
-and-)	
)	
MEGAN SIMPSON, individually,)	
)	
Defendants.)	

PLAINTIFF'S SECOND AMENDED FINAL EXHIBIT LIST

COMES NOW Plaintiff Troy D. German and submits the following Second Amended Final Exhibit List in accordance with the Court's Order granting him leave to amend his final exhibit list:

Exhibit List

No.	Description	Bates-stamp
1.	Letter to Troy D. German from Bob A. Ricks dated January 20, 1998	
2.	State of Oklahoma Office of Personnel Management Request for Personnel Action signed on June 8, 1998	
3.	State of Oklahoma Office of Personnel Management Request for Personnel Action signed on February 8, 1999	

4.	State of Oklahoma Office of Personnel Management Request for Personnel Action dated September 10, 2013	
5.	State of Oklahoma Performance Management Process for calendar year 2015 – Employee Troy German	
6.	State of Oklahoma Performance Management Process for calendar year 2016 – Employee Troy German	
7.	State of Oklahoma Office of Personnel Management Personnel Action dated March 15, 2017	
8.	State of Oklahoma Performance Management Process for calendar year 2017 – Employee Troy German	
9.	Memorandum dated May 15, 2018 from Major Jack McCoy to Colonel Michael Harrell with the Subject CPT Troy German #41 retention letter	
10.	General Order 01.19.00, Professional Conduct Expectations and Core Values	
11.	General Order 01.20.00, Rules of Conduct	
12.	General Order 02.02.00, Purpose, Primary Function and Philosophy of the Patrol	
13.	Captain Promotional Process revised June 15, 2014	
14.	Captain Promotional Process revised January 1, 2015	
15.	Captain Promotional Process revised January 8, 2015	
16.	Captain Promotional Process revised June 25, 2015	
17.	Captain Promotional Process revised December 1, 2017	
18.	Captain Promotional Process revised May 7, 2019	
19.	Captain Promotional Process revised March 02, 2020	
20.	Captain Promotional Process revised March 20, 2020	
21.	Email from Rusty Rhoades to Brian Orr dated March 2, 2018	

22.	Photos of Areas of Study List Prepared for March 2018 Functional Assessment	
23.	DPS Human Resources Division Position Requisition – Troop R Capitol Patrol dated May 11, 2018	
24.	DPS Human Resources Division Position Requisition – Troop A Capitol Patrol dated May 11, 2018	
25.	Announcement of Captain Position - Troop R opened June 28, 2018	
26.	Announcement of Captain Position - Troop A opened June 28, 2018	
27.	Email from Shavonne Lafayette dated June 29, 2018 with the Subject Notification of Captain Promotional Opportunities	
28.	Email from Brian Orr to HROHP dated July 6, 2018 with the Subject Emailing CPT resume.wpd	
29.	Email from Shavonne Lafayette dated July 9, 2018 with the subject FW: Notification of Captain Promotional Opportunities	
30.	Documentation of Email List for Captain Promotional Opportunities Emails	
31.	Board Member Non-Disclosure Forms for July 2018 Captain Promotional Opportunities	
32.	Promotional Candidates Non-Disclosure of Oral Interview Information – Brian Orr	
33.	Promotional Candidates Non-Disclosure of Oral Interview Information – Joe D. Williams	
34.	Troop A Board Test Questions and Scoring - Brian Orr	
35.	Troop R Board Questions and Scoring - Brian Orr	
36.	Brian Orr Command Assessment Scores	
37.	Emails between Shavonne Lafayette and Michael Harrell dated August 13, 2018 with the Subject RE Promotional Lists	
38.	Email from JD Wilson to Majors Group (BCC to Rusty Rhoades and Michael	

	Harrell) dated August 16, 2018 re: Promotions	
39.	Personnel Transaction Freeze Exception Request - Troop R	
40.	Personnel Transaction Freeze Exception Request - Troop A	
41.	Garrett Vowell text message to Mike Harrell dated July 16, 2018	
42.	Troy German Audio Recording of Conversation with Brian Orr dated July 17, 2018	
43.	Transcript of Troy German Audio Recording of Conversation with Brian Orr dated July 17, 2018	
44.	Troy German Audio Recording of Conversation with Brian Orr dated August 1, 2018	
45.	Troy German Audio Recording of Conversation with Brian Orr dated August 3, 2018	
46.	Troy German Audio Recording of Conversation with Brian Orr dated August 15, 2018	
47.	Troy German Audio Recording of Conversation with Brian Orr dated August 15, 2018 (2)	
48.	Text Messages Between Troy German and Rusty Rhoades	RHS Defendants 3-19
49.	Email from Troy German to Rusty Rhoades dated September 12, 2018	RHS Defendants 20
50.	Email from Billie Watkins to DPS dated September 21, 2018 with the subject Promotion Ceremony	
51.	Rusty Rhoades S7 SMS Extraction Report	
52.	Rusty Rhoades S7 MMS Extraction Report	
53.	Email from JD Wilson to Majors Group dated August 16, 2018 re Captain Selections	
54.	Troy German Text Chats with Ashley Kehl	
55.	Troop Z Case 18-0631CI Evidence List	

56.	Rusty Rhoades Troop Z Statement	
57.	Rusty Rhoades Troop Z Interview – File 801_0166	
58.	Rusty Rhoades Troop Z Interview – File 801_0069	
59.	Michael S. Harrell Troop Z Statement	
60.	Michael Harrell Troop Z Interview – File 801_0165 Col. Michael Harrell.WMA	
61.	Michael Harrell Troop Z Second Interview – File 801_0068 COL Michael Harrell 2nd.WMA	
62.	Ashley Kehl Troop Z Interview – File 801_0073 Ashley Kehl.WMA	
63.	Captain Brian Orr Troop Z Interview – File 801_0061 Orr.WMA	
64.	Captain Brian Orr Troop Z Interview – File 801_00700 Orr2.WMA	
65.	Major Garrett Vowell Troop Z Interview – File 801_0058.WMA	
66.	Major Garrett Vowell Troop Z Interview – File 801_0071.WMA	
67.	Senator Roger Thompson Troop Z Interview – File 801_0066	
68.	All other Troop Z Audio Recordings in Case 18-0631CI as necessary for impeachment or to refresh a witness' recollection	
69.	Certain Photographs Seized by Troop Z	
70.	Email from Megan Simpson to Barrett Bowers dated December 23, 2018 (showing BCC to Jason Holt)	
71.	Indictment	
72.	Information	
73.	Troy German Mugshot	
74.	DPS & OHP Statements re Indictment	
75.	Suspension with Pay Documentation	
76.	Dismissal of Information	
77.	German Retirement Memo	
78.	Email from Megan Simpson to Rusty Rhoades dated June 28, 2019 with attachment Press Release	

79.	Email from Megan Simpson to Rusty Rhoades and Michael Harrell dated August 16, 2019	
80.	Email from Chip Keating to Rusty Rhoades and others dated August 17, 2019 re Pending Personnel Matters	
81.	September 2, 2019 Letter from Kevin Stitt terminating Megan Simpson	
82.	September 9, 2019 Notice of Personnel Action - Termination of Megan Simpson	
83.	Court Minute in <i>State v. German</i>	German 6
84.	Billy D. "Rusty" Rhoades III <i>et al.</i> v. Kevin Stitt <i>et al.</i> , Verified Petition	
85.	Invoice and Receipts from the Law Office of Michael S. Johnson	
86.	German W2 and 1099s	
87.	German OMES Statements	
88.	German OLERS Statements	German 403-404 and 407-408
89.	Roger Thompson Text Messages with Kay Thompson	Thompson 4-6
90.	Roger Thompson Text Messages with Becky	Thompson 3
91.	Email from Alex Cameron to Roger Thompson dated August 16, 2019	Thompson 2
92.	Oklahoma Department of Public Safety, OHP Major Case Record Time Line for Case I-18-19	
93.	OSBI Report re: Michale Rodriguez and Photos from OSBI Report and Color Photos of Evidence	
94.	Letter from Michael Harrell to Gypsy Rodriguez dated February 21, 2019 re: OPS Investigation re Michael Rodriguez	
95.	Oklahoma Department of Public Safety, OHP Major Case Record Time Line for Case I-18-18	
96.	Brian Orr # 52, I-19-10, Supplemental Summary and Findings From Secondary Investigation, Specifically Truthfulness	

97.	All audio recordings produced by CPT Troy German, including recordings of Brian Orr and voicemail recordings	
98.	INTENTIONALLY LEFT BLANK	
99.	INTENTIONALLY LEFT BLANK PER THE COURT'S ORDER DATED NOVEMBER 16, 2021	
100.	INTENTIONALLY LEFT BLANK PER THE COURT'S ORDER DATED NOVEMBER 16, 2021	
101.	Chief's Order 18-17578	
102.	I-19-10 Orr Inquiry	
103.	I-19-10 Audio Recording of Paul Christian's interview of Major Garrett Vowell	
104.	I-19-10 Audio Recording of Paul Christian's interview of Brian Orr	
105.	I-19-10 Audio Recording of Paul Christian's interview of Brian Orr Part 1	
106.	I-19-10 Audio Recording of Paul Christian's interview of Brian Orr Part 2	
107.	Transcript of I-19-10 Audio Recording of Paul Christian's interview of Major Garrett Vowell	
108.	Transcript of I-19-10 Audio Recording of Paul Christian's interview of Brian Orr	
109.	Transcript of I-19-10 Audio Recording of Paul Christian's interview of Brian Orr Part 1	
110.	Transcript of I-19-10 Audio Recording of Paul Christian's interview of Brian Orr Part 2	
111.	Documents identified by any defendant and not otherwise objected to by Plaintiff	
112.	Documents produced by any party or any person and not otherwise objected to by Plaintiff	
113.	Documents necessary for rebuttal	
114.	Documents necessary for impeachment	
115.	Documents identified as exhibit at any deposition and not otherwise objected to by Plaintiff	

Dated this 18th day of November, 2021.

/s/Barrett T. Bowers

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CERTIFICATE OF SERVICE

I certify that on the 18th day of November, 2021, I served a true and correct copy of the above and foregoing on the following counsel of record:

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